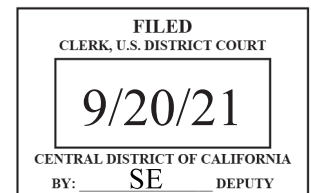


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**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

[UNDER SEAL],
Plaintiffs,

v.

[UNDER SEAL],
Defendants.

CASE NO. CV 18-08311-ODW(AS)

**NOTICE OF LODGING OF NON-
PAPER EXHIBIT (AUDIO-VIDEO)**

PART 13 OF 13 (EXHIBIT 150)

**[FILED IN CAMERA AND UNDER SEAL
PURSUANT TO 31 U.S.C. § 3730(b)(2)]**

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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA *ex*
rel. **IONM LLC**, a Delaware corporation
and *ex rel.* **JUSTIN**
CHEONGSIATMOY, M.D.;
STATE OF CALIFORNIA *ex rel.*
IONM LLC, a Delaware corporation and
ex rel. **JUSTIN CHEONGSIATMOY,**

CASE NO. CV 18-08311-ODW(AS)

**NOTICE OF LODGING OF NON-
PAPER EXHIBIT (AUDIO-VIDEO)**

**PART 13 OF 13 (EXHIBIT 150)
FOURTH AMENDED COMPLAINT**

FOURTH AMENDED COMPLAINT EXHIBITS PART 13 OF 13 (Ex. 150)
CASE NO. CV 18-08311-ODW(AS)

1 **M.D;** and **LOS ANGELES COUNTY** *ex*
2 *rel.* **IONM LLC**, a Delaware corporation;
3 and *ex rel.* **JUSTIN**
4 **CHEONGSIATMOY, M.D.**, and
5 **JUSTIN CHEONGSIATMOY, M.D.**, in
his individual capacity

6 Plaintiffs,

7 v.

8
9 **UNIVERSITY OF SOUTHERN**
10 **CALIFORNIA**, a California corporation;
11 and

12 **USC CARE MEDICAL GROUP, INC.**,
13 a California corporation,

14 Defendants.
15
16
17
18

19 **[FILED IN CAMERA AND UNDER SEAL**
20 **PURSUANT TO 31 U.S.C. § 3730(b)(2)]**
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1 PLEASE TAKE NOTICE that Exhibit 150 is a non-paper document that will be
2 lodged with the Court via electronic submission to the Courtroom Deputy in
3 accordance with the preference of chambers to email all [UNDER SEAL] filings to
4 ODW_Chambers@cacd.uscourts.gov.

5
6 Description of Exhibit:
7

8 Exhibit 150 is a video of USC employed IONM technologist, Nancy Nguyen,
9 who reported to Dr. Chui, the USC Chair of Neurology and LAC+USC Chief of
10 Neurology for which she was a direct Los Angeles County paid employee.

11 This video captures IONM technologist Nancy Nguyen in the act of ordering
12 patient care at LAC+USC Medical Center and submitting a false claim by
13 impersonating a physician and Los Angeles County contractor (Contractor # c078853),
14 Plaintiff-Relator Dr. Justin Cheongsiatmoy, M.D., in violation of the Federal False
15 Claims Act, the California False Claims Act, the California Insurance Frauds
16 Prevention Act and California Health and Safety Code 1279.1.

17 This exemplar false claim occurred despite Dr. Justin Cheongsiatmoy M.D.'s
18 repeated and explicit objections to fraud committed under his name. This video was
19 provided to the United States of America, the State of California, and Los Angeles
20 County as Exhibit A-217 on April 22, 2021.

21
22 Name, Address and Telephone Number of the Submitting Party:
23

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